

**PLANNING AND HERITAGE
STATEMENT**

**CHANGE OF USE AND
CONVERSION OF THE
FRONT BUILDING FROM
LEISURE (USE CLASS D2) TO
RESIDENTIAL (USE CLASS C3)
AND DEMOLITION OF THE REAR
BUILDING (USE CLASS D2) AND
CONSTRUCTION OF NEW
RESIDENTIAL BUILDING (USE
CLASS C3), CAR PARKING AND
LANDSCAPING**

**ARTHUR HILL POOL AND
FITNESS STUDIO,
221-225 KING'S ROAD,
READING, RG1 4LS**

**ON BEHALF OF
READING BOROUGH COUNCIL**

AUGUST 2020

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been produced by Shrimplin Planning & Development on behalf of Reading Borough Council in support of a full planning application for change of use and conversion of the front building from leisure (Use Class D2) to residential (Use Class C3) and demolition of the rear building (Use Class D2) and construction of new residential building (Use Class C3), car parking and landscaping at Arthur Hill Pool and fitness studio, 221-225 King's Road, Reading, RG1 4LS (hereafter referred to as the "Application Proposal" and the "Application Site"). The scheme would result in 15 residential units, comprising 12 1-bed flats and three 2-bed flats. It is intended that 100% of the units will be affordable at affordable rent.
- 1.2 The Application Site comprises the Arthur Hill Swimming Pool which was constructed in 1911. The roof of the rear part of the building/swimming pool has since been replaced and a rear extension containing a fitness studio was added in the 1980s. The building was closed in December 2016 and has been vacant for the last 3.5 years. It was designated as a Locally Important Building in 2017 with particular reference to the front part of the building. It is allocated for redevelopment for residential use under Policy ER1 of the recently adopted Local Plan (November 2019).
- 1.3 The Application Site is in a sustainable location close to the centre of Reading and within 50m of the District Centre of Cemetery Junction. It faces King's Road along which there are a number of bus routes and there is a bus stop almost directly in front of the building.
- 1.4 The Application Proposal has benefitted from informal discussions with the Council which have informed layout/design and the application supporting information.
- 1.5 The next chapter of this Heritage and Planning Statement explains the Application Proposal and the information that forms the application submission. Chapter 3 describes the Application Site and its wider context. Chapter 4 summarises the planning history of the site. Chapter 5 sets out the relevant policy framework and the

decision-making process. Chapter 6 provides an assessment of proposal against the development plan. A summary and conclusion are provided in Chapter 7.

2.0 APPLICATION PROPOSAL AND THE APPLICATION SUBMISSION

- 2.1 This chapter explains the Application Proposal and the information that forms the application submission.

The Application Proposal

- 2.2 change of use and conversion of the front building from leisure (Use Class D2) to residential (Use Class C3) and demolition of the rear building (Use Class D2) and construction of new residential building (Use Class C3), car parking and landscaping. The scheme would result in 15 residential units, comprising 12 1-bed flats and three 2-bed flats. It is intended that 100% of the units will be affordable at affordable rent.
- 2.3 The Application Proposal will contain 7 car parking spaces, of which one is accessible. It will contain 1 motorcycle parking space. It will contain 17 cycle parking spaces.

The application submission

- 2.4 The application submission comprises the information listed below. This has been discussed and agreed with the Case Officer:
- Air Quality Statement (HSP) (3 August 2020);
 - CIL Form 1: additional information;
 - CIL Form 2: assumption of liability;
 - Daylight and Sunlight Modelling Report (ION Consulting Engineers) (July 2020);
 - Design and Access Statement¹ (Saunders) (4 August 2020);
 - Drawings (Saunders) (May 2020):
 - Site location plan, drawing 8129_P100;

¹ Including commentary on landscape, materials, sustainability.

- Proposed site plan, drawing 8129_P101 (April 2020);
- Car parking, cycle and bin stores, drawing 8129_P102;
- Proposed floor plans (Block A and B) ground and first, drawing 8129_P104;
- Proposed floor plans (Block A and B) second and roof, drawing 8129_P105;
- Proposed floor plans (Block C and D) ground and first, drawing 8129_P106;
- Proposed floor plans (Block C and D) second and roof, drawing 8129_P107;
- Proposed elevations Block A and B north and south, drawing 8129_P109;
- Proposed elevations Block A and B east and west, drawing 8129_P110;
- Proposed elevations Block C and D north and south, drawing 8129_P111;
- Proposed elevations Block C and D east and west, drawing 8129_P112;
- Proposed section AA and BB, drawing 8129_P113;
- Existing floor plans, drawing 8129_P115;
- Existing sections, drawing 8129_P116;
- Proposed boundary treatment East and West, drawing 8129_P120;
- Proposed boundary treatment North and South, drawing 8129_P121;
- Proposed boundary treatment East and West, drawing 8129_P122.
- Energy Statement (ION Consulting Engineers) (6 August 2020);
- Noise Assessment (24 Acoustic) (28 July 2020);
- Preliminary Bat Roost Assessment (Middlemarch Environmental Ltd) (June 2020);

- Preliminary Ecological Appraisal (Middlemarch Environmental Ltd) (June 2020);
- Planning and Heritage Statement (Shrimplin Planning & Development) (August 2020);
- S106 Heads of Terms (Shrimplin Planning & Development) (5 August 2020);
- Thermal Comfort and Energy Demand Assessment (ION Consulting Engineers) (4 August 2020);
- Transport Technical Note² (HSP) (16 July 2020);
- Utilities Statement (ION) (22 June 2020).

2.5 The application supporting information demonstrates that there are no technical issues that prevent the Application Site being redeveloped.

² Includes commentary on vehicle parking, servicing, electric vehicle charging points.

3.0 APPLICATION SITE AND ITS WIDER CONTEXT

3.1 This chapter describes the Application Site and its wider context.

Application Site

3.2 The Application Site comprises the Arthur Hill Swimming Pool which was constructed in 1911. The roof of the rear part of the building/swimming has since been replaced and a rear extension containing a fitness studio was added in the 1980s. The building was closed in December 2016 and has been vacant for the last 3.5 years. It was designated as a Locally Important Building in 2017 with particular reference to the front part of the building. It is allocated for redevelopment for residential use under Policy ER1 of the recently adopted Local Plan (November 2019).

3.3 The Application Site contains a small area of parking to the front accessed from King's Road and another small area of car parking to the rear accessed from Norwood Road.

3.4 There is a change in levels across the Application Site. It falls away from the higher front (southern) part towards the lower rear (northern) part.

3.5 A detailed description of the site's history and of the heritage significance of the building is given in Chapter 4.

Application Site's wider context

3.6 The Application Site is in a sustainable location close to the centre of Reading and within 50m of the District Centre of Cemetery Junction. It faces King's Road along which there are a number of bus routes and there is a bus stop almost directly in front of the building. There are a number of nearby pedestrian crossing points across King's Road.

3.7 The Application Site faces King's Road, a main route into Reading along which there are a number of large scale buildings that are a mixture of commercial and blocks of flats. Westwards along King's Road is Reading College.

- 3.8 Immediately to the west of the Application Site is a newly built block of flats known as Crossway Point facing King's Road with lower scale buildings and a surface level car park to the rear. Immediately adjacent to the Application Site facing King's Road it is three storeys which to the rear facing Norwood Road it is four storeys above an undercroft car parking. At its highest point it rises to six/seven storeys above lower ground floor/undercroft car parking.
- 3.9 To the north of King's Road is a residential area containing buildings of varying styles and scales, with terraced houses and town houses, as well as blocks of flats, ranging from 2-3 storeys with pitches roofs. The rear of the Application Site faces Norwood Road, the southern side of which, on the same site as the Application Site, to the west contains rear accesses to the properties on King's Road as well as various more recently constructed residential blocks of two/three storeys with a staggered building line. To the east, round the bend in the road, is a residential terrace. The pavement along the southern side of Norwood Road is interrupted by various accessways and at one point is blocked by a wall and series of parking bays.
- 3.10 On the northern side of Norwood Road are two terraces of residential dwellings and then, at the eastern end, rear accesses to the facing Orts Road. At the eastern end of Norwood Road the terraces are two storeys whilst at the western end of Norwood Road they are three storeys, including a lower ground and slightly raised ground floor. The Application Site is opposite a break in the terraces where they turn a corner and so is not directly opposite the front of a residential building.
- 3.11 To the east of the Application Site is the Cemetery Junction District Centre containing a number of retail and commercial uses.
- 3.12 Immediately east of the Application Site is the Wycliffe Baptist Church facing King's Road with a surface level car park to the rear. Immediately adjacent to the Application Site it is a three storey building with a four/five storey church next to that.

3.13 The Application Site is not within a Conservation Area. However, there are three Grade II listed buildings nearby: Wycliffe Baptist Church to the east of the Application Site (list UID: 1155966); the entrance lodges and gate to Reading Old Cemetery further to the east (list UID: 1113512); the Gladstone Club building to the west on the other side of King's Road (list UID: 1113509) (see extract from Historic England website at Appendix 1).

3.14 The Wycliffe Baptist Church listing description is as follows:

“Built in 1887 as a daughter house to the King's Road Baptist Chapel (qv). North Italian classicizing-Romanesque in style. Grey brick with red brick corner piers, moulded plinth, strings at first floor level and first floor cill dressings. Central pedimented break above a five light arcade which is over three arch loggia porch. Two light windows in outer bays, to left a pedimented aedicule facing west; to right a four stage tower, possibly intended to have steeple.

Round headed windows. Porch arcade on pink granite columns with scroll caps. Moulded eaves band. Roman tile roof. Lower two storey extension to right (added 1885, foundation stone laid by Walter Palmer). It has a porch in gabled break and is linked to the tower by curved ground floor wall. Single and paired round headed lancets. Two oculi on first floor to left. Moulded brick modillion eaves cornice and gable verges. Ground floor projection with lean-to. A further gable to centre of first floor. Large clerestory lit hall behind with wooden brackets to hipped Roman tile roof.”

3.15 The entrance lodges and gate to Reading Old Cemetery listing description is as follows:

“Entrance Lodges and gates to Cemetery (Formerly listed under Cemetery) SU 7373 8/77 22.3.57. II 2. Circa 1840 by William Brown (local architect). (Attributed to Nathaniel Briant however). 2 storeys. Bath stone. Arched entry with moulded architrave and keystone in centre of rectangular block with Doric pilasters with moulded entablature and pediment over. Flanking lodges

with entablature and blocking course. Hipped slate roof with flanking chimneys. Each lodge 1 window, glazing bar sashes, with architrave surround. Rear: parapet; recessed centre; sides have shallow pediments to parapets. Contemporary gates, cast iron with a row of roses below spearhead rails.”

3.16 The Gladstone Club listing description is as follows:

“Circa 1840. Stucco villa. Similar in style to the Eldon Square villas. 2 storeys and basement with 3 storey cross wing off centre left. Ground floor channelled. Plinth. Right hand corner partly quoined. Flat eaves to hipped slate roof. 1:1:3 bays glazing bar sashes (with raised surrounds on 1st floor). Projecting porch, with arched entrance and side lights, in centre of right hand wing”

3.17 We consider the Application Proposal’s impact on these two listed buildings in Chapter 6.

4.0 PLANNING HISTORY

- 4.1 As explained above, Arthur Hill Swimming Pool was constructed in 1911. The roof of the rear part of the building/swimming has since been replaced and a rear extension containing a fitness studio was added in the 1980s.
- 4.2 Following a review of existing and future leisure facilities across the Borough the Arthur Hill Swimming Pool was closed in December 2016 and has been vacant for the last 3.5 years.
- 4.3 The building was added to the Council's 'List of Locally Important Buildings and Structures' in April 2017 (Ref LL9). The description explains the building and its history. Note that it highlights that the most important element is the front building and all of the specific architectural elements listed are found on this part of the building:

"Building constructed in 1911. Is substantially complete, although the original individual baths were replaced with one swimming pool and the roof covering of the pool area appears to be more modern. Greatest significance is in terms of the frontal building (King's Road), although not great in scale, the intricacy and largely intact frontal building in the Italianate Style makes it a pleasing building of townscape merit.

The building has historical association with local philanthropist (through his coal business) Arthur Hill, J.P. was Mayor of the Borough of Reading from 1883-1887. The Arthur Hill Swimming Baths were completed in 1911 in his memory, by his children, as Hill died in 1909. The architect was C B Willcocks and the builder was Robert Curtis. The land was donated by Dr. Jamieson Hurry J.P., who married Hill's daughter and was responsible for the founding of West Reading Library (Grade II)(now Battle Library). Arthur Hill and Octavia Hill, half-sister of Arthur Hill and founder of the National Trust, attended the opening of the building. The building has played an influential role as part of the social well-being of the town by providing the first covered bathing facility in the

town, instead of bathing in the Thames or the King's Meadow Baths (which are open air). Also used by soldiers in wartime and for health reasons, canoe-clubs, and life-saving courses.

It shows noteworthy quality of workmanship and materials in an ornate Victorian style: portico, original sash windows, bracketed eaves, decorative brickwork, stone window surrounds, original matching chimneys. Rear section of building has some further interest (arches and columns) but these are not fully revealed.

Conrad Birdwood Willcocks was an architect from Caversham, who also worked on Fairmile Hospital, Cholsey (Listed Grade II). He also appears to have been involved in the design of All Saint's Hall (Downshire Square) (Grade II) and appears to have lectured in architecture.

- 4.4 The redevelopment of the Application Site was considered in detail through the Local Plan process. It was identified in the Housing and Economic Land Availability Assessment (November 2017) (site pa004). The Council's Hearing Statement for Issue 14: East Reading (2018) (Local Plan Examination reference EC016) explained the background to and justification for the allocation³ and then summarises the key issues

³ "As general background, Arthur Hill Swimming Pool was constructed circa 1911 as a purpose built swimming pool and, other than a later addition at the rear that now houses a small gym, remains largely as originally built. The pool has limited capacity but inherently high staffing and operating costs. A survey in 2015 identified that the pool is in poor condition, and would require costs of at least £650,000 to repair. Given that replacement pool provision only around 850 metres away at Palmer Park, where there are already a number of sports facilities, was proposed, and is included within the Local Plan at ER1j, it was decided by Policy Committee on 26th September 2016 that the pool should close permanently in December 2016. An Expression of Interest under the Community Right to Challenge was rejected at Policy Committee on 10th April 2017. There is no realistic prospect of the site being used for continued swimming use.

The Local Plan therefore needs to determine an appropriate future for the site. Representations have sought a continued leisure use of the facility. However, there are no current proposals for specific leisure uses, and no particular likelihood of delivery, particularly given the proposed investment in combined leisure provision nearby. As has been shown throughout the Local Plan evidence, the most pressing development needs, and the needs which the Local Plan is not able to meet in full, are for housing. This is a narrow, constrained site with limited commercial potential, which lends itself to a residential allocation.

arising from the building's Local Listing, in particular that, as explained above, the most important element is the front building:

"The local listing... highlights that the greatest significance is in terms of the frontage building to London Road, which is the main way in which the building is experienced...

All of the specific elements referenced in the local listing - portico, original sash windows, bracketed eaves, decorative brickwork, stone window surrounds, original matching chimneys – refer principally to the frontage building. The flanks of the building are largely obscured by adjacent buildings, and the pool itself to the rear has a roof that appears to be more modern. The rear of the building as viewed from Norwood Road is far less significant, including some modern extensions, and although the local listing does note some further interest, notably arches and columns, it clarifies that these are not fully revealed."

- 4.5 The Local Plan Inspector agreed with the allocation⁴ and the site was allocated under Policy ER1: Sites for Development in East Reading as site ER1h for residential development:

"The following sites will be developed according with the principles set out in this policy" (emphasis added).

- 4.6 The issues specifically identified in the Application Site's allocation are addressed in Chapter 6.

In terms of consistency with other policies in the Local Plan, the main possible issues are in terms of the effects on the locally-listed building and the loss of leisure."

⁴ "Site allocation ER1h (Arthur Hill Swimming Pool) is allocated for residential development, which seeks to retain the existing frontage of the building where possible. The site is a locally listed building and its allocation for residential development would be consistent with Policy EN4 relating to locally important heritage assets. Policy RL6 relates to the protection of leisure facilities, however considering the allocation of land at Palmer Park (Site ER1j) which includes a new swimming pool, the allocation for residential development at ER1h is justified." (Local Plan Inspector's Report, paragraph 123).

5.0 POLICY FRAMEWORK AND DECISION MAKING PROCESS

5.1 The chapter sets out the development plan and the decision making process.

Development plan

5.2 The relevant parts of the development plan comprise the recently adopted Reading Local Plan 2013-2036 (November 2019).

5.3 Relevant supplementary planning documents are material planning considerations, including the Affordable Housing SPD (July 2013) and Sustainable Design and Construction SPD (December 19), although both pre-date the NPPF and adopted Local Plan which limits the weight that can be given to them. The NPPF (February 2019), with additional guidance in the NPPG, is also an important material planning consideration.

Decision-making process

5.4 Planning law requires that applications for planning permission must be “determined in accordance with the Development Plan unless material considerations indicate otherwise” (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

5.5 The NPPF explains that “Plans and decisions should apply a presumption in favour of sustainable development” (paragraph 11). For “decision taking” this means:

- “approving development proposals that accord with the development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

5.6 In this case the policies which are most important for determining the application are up to date. As a result, the Application Proposal needs to be assessed on the basis of whether it is in accordance with the development plan.

5.7 The recently adopted Local Plan reflects the above approach in Policy CC1: presumption in favour of sustainable development.

5.8 In considering applications it is important to bear in mind the advice in the NPPF's chapter on “decision making”, reflected in Policy CC1, which begins by encouraging local planning authorities to approve applications:

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.” (paragraph 38).

5.9 The next chapter assesses the Application Proposal within this policy framework and decision making process.

6.0 ASSESSMENT OF THE APPLICATION PROPOSAL AGAINST THE DEVELOPMENT PLAN

- 6.1 This chapter considers the principle of development and assesses the Application Proposal against the development plan in that it delivers housing in a sustainable urban location; makes effective use of scarce urban land; delivers affordable housing; is of a high quality design; and does not cause harm to non-designated heritage assets.

Principle of development

- 6.2 As explained in Chapter 4, following a review of existing and future leisure facilities across the Borough the Arthur Hill Swimming Pool was closed in December 2016 and has been vacant for the last 3.5 years. This culminated in the Application Site being allocated for redevelopment under Policy ER1: Sites for Development in East Reading as site ER1h for residential development:

“Development for residential whilst retaining the frontage of the building where possible.

Development should:

- Avoid an adverse impact on the setting of nearby listed buildings;
- Consider the merits of the option of retaining the existing frontage;
- Address noise impacts on residential use; and
- Address air quality impacts on residential use.

Site size: 0.11 ha 6-10 dwellings”

- 6.3 The supporting text emphasises that development on these sites will be appropriate in principle:

“This policy identifies those sites within East Reading where development will be appropriate. As well as contributing to meeting the identified needs of the

Borough, allocation can help provide physical regeneration of sites which are in some cases vacant or underused.” (paragraph 9.3.1, *emphasis added*).

6.4 The impact on the setting of nearby listed buildings and the merits of the option of retaining the existing frontage are considered below. The noise impacts and the air quality impacts are considered, respectively, in the Noise Impact Assessment and the Air Quality Assessment submitted as part of the planning application.

6.5 Policy OU1: New and Existing Community Facilities allows for the redevelopment of such facilities:

“Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility”.

6.6 The fact that the facility is no longer needed has been demonstrated and accepted at the Examination of the Local Plan and is reflected in its allocation for redevelopment.

6.7 The principle of development is therefore in accordance with Policies ER1 and OU1.

Delivers housing in a sustainable urban location

6.8 Policy H1: Provision of Housing sets out the Council’s housing target, noting that it is a minimum target:

“Provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036.” (*emphasis added*).

6.9 The supporting text emphasises that there is a “pressing” need for housing but that delivering it will be challenging and will rely on brownfield sites:

“There is a pressing need for additional housing in Reading and the surrounding area” (paragraph 4.4.1).

“However, Reading is a very tightly defined urban area, and sites for new development are limited. The undeveloped land that does exist is mainly either in the functional floodplain or is important public open space. Provision of new housing therefore involves a heavy reliance on previously developed land, and the supply of such sites constrains the amount of housing that can be delivered in the Borough” (paragraph 4.4.3).

- 6.10 The Application Site can therefore make an important contribution towards meeting Reading’s pressing housing needs in accordance with Policies H1 and ER1.

Makes effective use of scarce urban land

- 6.11 The NPPF (February 2019) has a specific chapter dealing with “Making effective use of land”. This begins by making clear that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions” (paragraph 117).

- 6.12 It specifically highlights the need to make best use of underutilised land and buildings:

“d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively...” (paragraph 118, criterion d)

- 6.13 The Local Plan picks up this key issue. Local Plan Policy CC6: Accessibility and the Intensity of Development explains that more accessible sites can accommodate greater levels of development.

“The scale and density of development will be related to its level of accessibility by walking, cycling and public transport to a range of services and

facilities, with the densest and largest scale development taking place in the most accessible locations”.

6.14 The supporting text explains what is meant by good accessibility:

“As a rule of thumb, a good level of accessibility is considered to be that within 400m of a defined centre with a good range of facilities by pedestrian routes, and within 400m by pedestrian routes of a bus stop served by a service with a frequency of better than one bus every 20 minutes in each direction within daytime hours (7.00 a.m. to 7.00 p.m.). In many parts of Reading, it will be important to ensure that access to a range of facilities is encouraged, and not affected by existing barriers, such as major roads, rivers and railways.” (paragraph 4.1.27).

6.15 Policy H2: Density and Mix explains that the densities on allocated sites are indicative and will be affected by numerous factors which will need to be considered at the application stage:

“Residential development capacity figures within the site allocation policies are often based on [indicative densities for different types of area in figure 4.5], but the capacity of each site will likewise depend on various factors that need to be addressed at application stage, including detailed design and layout, and may differ from the range set out in the allocation.”

6.16 This is reinforced in the supporting text which emphasises the need to make the most efficient use of sites whilst considering the characteristics of each site and each site’s location:

“With the significant need for housing in Reading and surrounding areas, it is important that efficient use is made of the land that is available to boost the delivery of new homes. However, there are other considerations that need to be weighed against this, in particular the character of the surrounding areas and any other particular sensitivities. Each site has its own particular

characteristics, and it is not appropriate to set down exact densities in this policy. Likewise, dwelling figures and bed spaces in site allocations policies CR11-14, SR2-4, WR1-3, CA1-2 and ER1 should be treated as indicative, as the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout. This may mean that dwelling and bed space totals for an allocated site fall outside the indicative range specified in the respective policy.” (paragraph 4.4.7, emphasis added).

- 6.17 This approach is reflected in Policy ER1: Sites for Development in East Reading for residential development. The Application Site is allocated as site ER1h: Arthur Hill Swimming Pool for 6-10 dwellings but the supporting text states that:

“Where dwelling or floorspace figures are included alongside the allocations, these are intended as a guide, and usually reflect an indicative maximum capacity. They are based on an initial assessment taking into account the characteristics of each site. However, the capacity of sites will ultimately depend on various factors that need to be addressed at application stage, including detailed design and layout” (paragraph 9.3.2, emphasis added).

- 6.18 Both the NPPF and the Local Plan emphasise the need to make efficient use of scarce brownfield land, in particular in accessible locations. The Application Site is in a highly accessible location being directly opposite a bus/cycle lane and bus stop and within c50m of the Cemetery Junction District Centre which contains a full range of services including two convenience foodstores, a post office and numerous cafés and restaurants. As the Application Site is in a highly accessible location it can accommodate a greater level of development in accordance with Policy CC6.

- 6.19 As both Policy H2 and Policy ER1 make clear, the number of units that it is suggested that allocated sites can accommodate is indicative and the actual number of units that a site can accommodate should be judged through the planning application process which allows an analysis of the characteristics of a site and its location. A detailed

analysis of the Application Site and its context is given in Chapter 3 and in the Design and Access Statement which demonstrates that the Application Site can accommodate more than the indicative number of units suggested in Policy ER1h.

- 6.20 The Application Proposal (150 dwellings/hectare) meets the “Indicative density range” set out in Figure 4.5 for a Town Centre location (above 150 dwellings/hectare), given that it is in a District Centre.
- 6.21 The Application Site therefore makes effective use of scarce urban land in accordance with Policies CC6, H2 and ER1.

Delivers affordable housing

- 6.22 NPPF Chapter 5: Delivering a sufficient supply of homes sets out “... the Government’s objective of significantly boosting the supply of homes...”, including affordable homes.
- 6.23 Policy H3: Affordable Housing seeks to deliver affordable housing. The supporting text explains the critical need for affordable housing and the important role it plays:

“The Berkshire (with South Bucks) Strategic Housing Market Assessment (SHMA, 2016) has once again emphasised the critical need for affordable housing within Reading as well as the remainder of Berkshire. The SHMA identified a need for 406 new affordable homes per year in Reading, which represents the majority of the overall housing required. The consequences of not providing much-needed affordable homes would be severe, and would include homelessness, households in temporary or unsuitable accommodation, overcrowding and younger people having to remain living with parents for increasing periods. Insufficient affordable housing will also act as an impediment to economic growth, as firms will face increasing problems with accommodation for their workforce. Meeting even a substantial proportion of the identified housing need presents significant challenges...” (paragraph 4.4.19).

6.24 The Policy explains that:

“Priority needs are currently for housing with two or more bedrooms that can house families.”

6.25 The reflects the supporting text to Policy H2 which highlights that:

“For affordable housing, the focus of need was on one and two-bedroom accommodation.” (paragraph 4.4.9).

6.26 It also reflects guidance in the Council’s Affordable Housing SPD (July 2013). As explained in Chapter 5, this pre-dates the NPPF and adopted Local Plan which limits the weight that can be given to them. Nevertheless, we note that whilst it identifies a significant priority for larger dwellings, it states that:

“The largest need is for smaller accommodation (1 or 2 bedroom). For these properties, lettings at target rents would be the preference to meet the most urgent needs” (paragraph 4.14).

6.27 We have discussed the Application Proposal with Reading Borough Council Strategic Housing Manager, Sarah Tapliss, who supported the mix of units and tenure proposed:

“Research indicates that in Reading an annual income of £72k is required in order to be able to afford to buy an average three bed house in Reading, and a household income of £32k to be able to afford to rent an average 2 bed property. Demand for Social housing continues to outstrip supply, with pressures on all types of accommodation from specialist housing through to family homes. In June 2020 there were 3,417 households registered with the local authority for an affordable rented home, and although pressures is felt most acutely for family sized homes, over 40% of the Housing Register are requesting 1 and 2 bed properties. The emerging Housing Strategy, due to be published later in the year is reviewing the increasing pressure for keyworker

housing as public services in the town struggle to recruit and retain staff who are struggling with their housing costs. The size of the of the properties, and location of the Arthur Hill development means that it is an excellent option for meeting the needs of key workers, in particular those working in the Royal Berkshire Hospital.” (email of 26 July 2020).

- 6.28 The applicant will commit to 30% of the units being affordable, which is policy compliant, but with the intention that 100% of the units will be affordable. The affordable rent tenure is supported by the Council’s Strategic Housing Manager. It will provide a mix of one and two bed units. The Application Proposal is therefore in accordance with Policy H3 and the Council’s Affordable Housing SPD (July 2013).

High quality design

- 6.29 NPPF Chapter 12 on “Achieving well-designed places” begins by stating that:

“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.” (paragraph 124).

- 6.30 Local Plan Policy CC7: Design and the Public Realm sets out a wide range of considerations that need to be borne in mind when designing schemes:

“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including:

- Layout: urban structure and urban grain;
- Landscape;
- Density and mix;
- Scale: height and massing; and

- Architectural detail and materials

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: -

- Character - a place with its own identity and sense of place
- Continuity and enclosure
- Quality of the public realm and provision of green infrastructure and landscaping
- Ease of movement and permeability
- Legibility - clear image and easy to understand
- Adaptability – capable of adaptation over time
- Diversity – meets a wide range of needs.

Developments will also be assessed to ensure that they: -

- Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;
- Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;
- Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;
- Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.

Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters.

- 6.31 Policy CC8: Safeguarding Amenity sets out a number of important considerations about the living environment of existing and proposed residential properties. Further guidance is provided in the supporting text.
- 6.32 Policy H5: Standards for New Housing sets out a number of space and energy standards that need to be incorporated into schemes, although a number are for schemes that are larger than the Application Proposal.
- 6.33 Policy H8: Residential Conversions relates to proposals to convert buildings into self-contained flats, which is relevant to the change of use and conversion of the front building. The Policy sets out various criteria that need to be considered.
- 6.34 Policy H10: Private and Communal Outdoor Space seeks to ensure residential dwellings have appropriate outdoor space. It states that:
- “Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens.”
- 6.35 It goes on to set out a number of considerations that should be borne in mind when designing outside space. The supporting text also sets out space standards for flats outside Central Reading of 25m²/1-2 bedroom flat, but indicates that this is only “... a useful guide” (paragraph 4.4.87).
- 6.36 All of these considerations set out in Policies CC7, CC8, H5, H8 and H10 have been borne in mind in designing the scheme. Further detail can be found in the Design and Access Statement.

Does not cause harm to non-designated heritage assets

- 6.37 NPPF Chapter 16 sets out the approach that should be taken towards heritage assets. It begins by explaining that:

“Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations” (paragraph 184, emphasis added).

- 6.38 For designated heritage assets⁵, causing “substantial harm” must be weighed against “substantial public benefits” or meeting specific tests (paragraph 195) whilst causing “less than substantial harm” must be weighed against “public benefits” (paragraph 196). However, for non-designated heritage assets, like the Application Site, the test is for a “balanced judgement” weighing harm/loss against the significance of the heritage asset:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” (paragraph 197, emphasis).

- 6.39 Significance for a heritage policy is defined as:

⁵ Which the glossary defines as:

“Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.”

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”

6.40 Local Plan Policy EN1: Protection and enhancement of the historic environment explains that:

“All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.”

6.41 Local Plan Policy EN4: Locally Important Heritage Assets states that:

“Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.

Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset’s significance. Where it is accepted by the Local Planning Authority that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.”

- 6.42 Policy EN1's reference to "clear and convincing justification" and "usually in the public benefits", and Policy EN4's reference to "benefits of the development significantly outweigh the asset's significance", need to be read in the context of paragraph 197 of the NPPF which instead requires "balanced judgement" (explained above).
- 6.43 It is also important to note that the allocation of the Application Site under Policy ER1h does not require the retention of the front building, but simply that proposals should "Consider the merits of the option of retaining the existing frontage". By retaining the frontage building the Application Proposal therefore exceeds the requirements of the Policy.
- 6.44 Chapter 4 explains the planning history of the Application Site, including its addition to the Local List. As the Council's Local Plan Examination Hearing Statement for Issue 14 (2018) (Local Plan Examination reference EC016) neatly summarises (see Chapter 4), the local listing makes clear that the front part of the building facing London Road is of the most importance and contains all of the specific elements referenced in the local listing. This part of the building will be retained, improved and brought back into use.
- 6.45 The rear part of the building which will be removed as part of the Application Proposal is, in contrast to the front part, largely hidden from view. It contains various later additions, including a new roof over the swimming pool and rear extension added in the 1980s containing a fitness studio, which further erode its importance.
- 6.46 As explained in Chapter 3, there are three Grade II listed buildings near the Application Site, Wycliffe Baptist Church, the entrance lodges and gate to Reading Old Cemetery and the Gladstone Club. The Application Site is separated from Wycliffe Baptist Church by a large three storey building. It is separated from the entrance lodges and gate to Reading Old Cemetery and from the Gladstone Club by the wide, busy King's Road. Moreover, the rear part of the Gladstone Club building facing King's Road and the Application Site has been heavily altered with a later addition. Most importantly,

the front building on the Application Site will remain. The Application Proposal will therefore not have a negative impact on the setting of these three listed buildings.

- 6.47 The Application Proposal is therefore in accordance with Policy EN1: Protection and enhancement of the historic environment. Without prejudice to our position that Policy EN1 needs to be read in the context of paragraph 197 of the NPPF which requires “balanced judgement”, the Application Proposal will have the significant public benefit of delivering affordable housing and improving the appearance of the local area.

7.0 SUMMARY AND CONCLUSION

- 7.1 This Heritage and Planning Statement has been produced by Shrimplin Planning & Development on behalf of Reading Borough Council in support of a full planning application for conversion of the front building (Use Class D2) to residential (Use Class C3) and demolition of the rear building (Use Class D2) and construction of new residential building (Use Class C3), car parking and landscaping at Arthur Hill Pool and fitness studio, 221-225 King's Road, Reading, RG1 4LS (hereafter referred to as the "Application Proposal" and the "Application Site"). The scheme would result in 15 residential units, comprising 12 1-bed flats and three 2-bed flats. It is intended that 100% of the units will be affordable at affordable rent.
- 7.2 Chapter 2 explained the Application Proposal and the information that will form the application submission. Chapter 3 described the Application Site and its wider context.
- 7.3 Chapter 4 summarised the planning history of the site. Following a review of existing and future leisure facilities across the Borough the Arthur Hill Swimming Pool was closed in December 2016 and has been vacant for the last 3.5 years. The building was added to the Council's 'List of Locally Important Buildings and Structures' in April 2017 (Ref LL9). The redevelopment of the Application Site was considered in detail through the Local Plan process the site which culminated in it being allocated under Policy ER1h.
- 7.4 Chapter 5 set out the relevant policy framework and the decision-making process, concluding that the Application Proposal needs to be considered in terms of its conformity with the development plan. Chapter 6 provided an assessment of Application Proposal against the development plan. It makes clear that the principle of development is acceptable as the fact that the facility is no longer needed has been demonstrated and accepted at the Examination of the Local Plan. The requirements of Policy ER1h are addressed in this Heritage and Planning Statement and in the Noise Impact Assessment and the Air Quality Assessment submitted as part of the planning

application. The Application Proposal is therefore in accordance with Policy ER1: Sites for Development in East Reading and Policy OU1: New and Existing Community Facilities.

- 7.5 The Application Proposal will make an important contribution towards meeting Reading's pressing housing needs in accordance with Policy H1 Provision of Housing and Policy ER1: Sites for Development in East Reading.
- 7.6 The Application Proposal makes effective use of scarce urban land in accordance with Policy CC6: accessibility and the intensity of development, Policy H2: Density and Mix and Policy ER1: Sites for Development in East Reading for residential development.
- 7.7 The applicant will commit to 30% of the units being affordable, which is policy compliant, but with the intention that 100% of the units will be affordable. The affordable rent tenure is supported by the Council's Strategic Housing Manager. It will provide a mix of one and two bed units. The Application Proposal is therefore in accordance with Policy H3 and the Council's Affordable Housing SPD (July 2013).
- 7.8 All of the considerations set out in Policy CC7: Design and the Public Realm, Policy CC8: Safeguarding Amenity, Policy H5: Standards for New Housing, Policy H8: Residential Conversions and Policy H10: Private and Communal Outdoor Space have been borne in mind in designing the scheme. Further detail can be found in the Design and Access Statement.
- 7.9 The building was added to the Council's 'List of Locally Important Buildings and Structures' in April 2017 (Ref LL9). The local listing makes clear that the front part of the building facing London Road is of the most importance and contains all of the specific elements referenced in the local listing. This part of the building will be retained, improved and brought back into use. The rear part of the building which will be removed as part of the Application Proposal is, in contrast to the front part, largely hidden from view. It contains various later additions, including a new roof over the

swimming pool and rear extension added in the 1980s containing a fitness studio, which further erode its importance.

- 7.10 As explained in Chapter 3, there are three Grade II listed buildings near the Application Site, Wycliffe Baptist Church, the entrance lodges and gate to Reading Old Cemetery and the Gladstone Club. The Application Site is separated from Wycliffe Baptist Church by a large three storey building. It is separated from the entrance lodges and gate to Reading Old Cemetery and from the Gladstone Club by the wide, busy King's Road. Moreover, the rear part of the Gladstone Club building facing King's Road and the Application Site has been heavily altered with a later addition. Most importantly, the front building on the Application Site will remain. The Application Proposal will therefore not have a negative impact on the setting of these three listed buildings.
- 7.11 The Application Proposal is therefore in accordance with Policy EN1: Protection and enhancement of the historic environment. Without prejudice to our position that Policy EN1 needs to be read in the context of paragraph 197 of the NPPF which requires "balanced judgement", the Application Proposal will have the significant public benefit of delivering affordable housing and improving the appearance of the local area.
- 7.12 The Application Proposal is therefore in accordance with the Local Plan. We therefore respectfully request that the Application is allowed and planning permission is granted.

Appendix 1

